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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
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REFERENCE LRCP 7.1(d)(1)  
 (Rule Number/Section)

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF ARIZONA**

<p>JAMES OLIVER ROMINE JR.           Plaintiff</p> <p><b>v.</b></p> <p>JAMES NICHOLAS          STANTON</p> <p>Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p><b>AMENDED COMPLAINT ONE</b></p> <p>TRIAL BY JURY: No</p>
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**COMPLAINT**

The Plaintiff, James O. Romine Jr., files this Amended Complaint against  
 James Nicholas Stanton to The Court as follows:

**JURISDICTION AND VENUE**

1. This case classifies under diversity of citizenship.
2. The Plaintiff, James Oliver Romine Jr is a resident of the State of Arizona and  
 a Citizen of the United States.
3. The Defendant, James Nicholas Stanton, a United States Person and is

1 currently a resident of Brandon, Mississippi. It is uncertain at this time if The  
2 Defendant is a Citizen of the United States.

3  
4 4. The Defendant gains advertising revenue from individuals residing in the State  
5 of Arizona. The Defendant also sells merchandise which he profits from in the  
6 State of Arizona.

7  
8 5. The Defendant also has a minimum \$1 subscription fee per month from  
9 subscribers to The Defendants Patreon.com of which there are almost 4000.  
10 These facts instill that The Defendant has personal jurisdiction within the State  
11 of Arizona.

12  
13 6. The Defendant's defamatory statements reach into the State of Arizona and  
14 have even affected The Plaintiff at his place of previous part time employment  
15 where the defamation affected the views of co-workers on The Plaintiff.

16  
17 7. The Defendant advertises his Patreon site through his Youtube and other media  
18 outlets which is visible to viewers inside the State of Arizona and this  
19 advertisement directly leads viewers to the libelous statements involved in this  
20 case.

21  
22 8. Both Patreon.com's usage and Shark Robot LLC's usage as distribution and  
23 subscriber based financial instruments within The State of Arizona give cause  
24 to personal jurisdiction.

25  
26 9. Damage in excess of \$2 million USD to The Plaintiff has taken place directly  
27 in The State of Arizona. Actions taken by The Defendant were aimed at The  
28

1 Plaintiff with the knowledge of The Plaintiff being in Arizona and that those  
2 actions would affect The Plaintiff there.

3 10. As shown below, new evidence has surfaced where The Defendant is also a  
4 competitor on Steam/The Distributor where The Plaintiff was primarily  
5 defamed by the defendant's actions depicted in this complaint. As a member of  
6 a development team developing for the Steam PC distribution platform and  
7 having now stated prior involvement with other developers in a for profit  
8 manner, The Defendant is involved in direct profit from world-wide  
9 distribution of pc games competing in the same market as The Plaintiff. These  
10 games sell in Arizona and The Defendant has and will profit from sales within  
11 Arizona.

12 11. For the purposes of this Complaint, thejimquisition.com article where portions  
13 of the Libel Per Se occurred will be referred to here forward as The Article  
14 located at: [http://www.thejimquisition .com/2015/09/digital-homicide-and-the-](http://www.thejimquisition.com/2015/09/digital-homicide-and-the-case-of-the-sockpuppet-developers/)  
15 [case-of-the -sockpuppet-developers/](http://www.thejimquisition.com/2015/09/digital-homicide-and-the-case-of-the-sockpuppet-developers/) Copy of this article now included as  
16 Attachment N15.

17 12. For the purposes of this Complaint, The Defendants twitter feed will be  
18 referred to as Tweeted: <https://twitter.com/JimSterling>.

19 13. The Plaintiff's business partner Steam/Valve Corporation will be referred to  
20 here forward as The Distributor.

21 **PROOF OF REPRESENTATION FOR CAUSES OF ACTION**

14. Micro Strategic Designs was a sole proprietor account owned entirely by The Plaintiff. Statements made by The Defendant aimed at DHS, James Romine, and Robert Romine were then associated to Micro Strategic Designs which was a full rebrand where The Plaintiff setup all future business efforts. DHS was never to be used again by The Plaintiff or any member/manager of DHS. The objective of The Article and Tweets by The Defendant was to associate sole proprietor efforts to DHS to continue the harassment, disrupt business, and destroy as much of The Plaintiff's work as possible. Two sections are shown in The Article associating Micro Strategic Designs and The Plaintiff, as the Sole Proprietor, to the events and false accusations that were stated within it. Those two statements are:

**"The story, of course, doesn't end here. Digital Homicide seemingly has a third sockpuppet company, Micro Strategic Game Designs. MSGD recently got Attrition: Nuclear Domination (<http://store.steampowered.com/app/392870/>) through Steam Greenlight. It looks terrible – obviously – and was recently removed from the Digital Homicide Complete Pack Bundle (<https://steamdb.info/app/392870/history/#> = ), demonstrating its link to the infamous studio."**

And

**"Speaking of which, Digital Homicide also appears to be behind a new website, BundleBlitz (<http://www.bundleblitz.com/>), a code giveaway site with a special interest in Steam Greenlight hopefuls. BundleBlitz heavily featured Nuclear Attrition recently, though I'm still looking into a definitive link."**

15. The Attrition: Nuclear Domination game made it entirely through Greenlight

- 1        on its own under Micro Strategic Designs Greenlight Account with a 34% vote  
2        ratio and 500 yes votes and represented approximately three hundred hours of  
3        work and programming over 25000 lines of code.  
4
- 5        16. Attachment N1 shows Micro Strategic Designs sole proprietor business Paypal  
6        Account where advertising for the lost games was paid for with approximately  
7        \$1000.  
8
- 9        17. \$50,000 worth of game keys of Attrition nuclear domination were used to  
10       advertise the lost games, and when destroyed, that benefit was entirely lost.  
11
- 12       18. Attachments N2 and N3 show Yahoo pen name support email account Jessy  
13       Mattock. This was the support and business email for the sole proprietor Micro  
14       Strategic Designs. Over 30 support emails to Micro Strategic Designs  
15       customers were sent and received from August 2015 through to October 2015.  
16
- 17       19. Attachment N4 shows the Business Paypal account used by The Plaintiff for  
18       Micro Strategic Designs as sole proprietor.
- 19       20. **As can be seen here, The Defendant has stated that “DHS has a third sock**  
20       **puppet” and The Plaintiff’s sole proprietor has been referred to and**  
21       **covered in The Article, and consequently Tweeted, displaying no**  
22       **discernable difference between how The Defendant speaks in regards to**  
23       **the rebranded plaintiff’s soleproprietor Micro Strategic Designs, The**  
24       **Plaintiff, and Digital Homicide. The objective of The Defendant is to**  
25       **associate them all, do damage to them all, and destroy them all.**  
26  
27  
28

- 1 21. The orchestrated attack was meant, as can be seen in the article, to stop a  
2 rebranding. That rebranding had already been performed at the time of  
3 defamation.  
4  
5 22. Titles already under Digital Homicide would have remained there and no  
6 further use of the Digital Homicide brand was intended.  
7  
8 23. By The Defendant's actions, purposefully done to cause public outrage, The  
9 Plaintiff was forced to continue business under Digital Homicide even though  
10 actions had already been taken to separate.  
11  
12 24. **As such, all unassociated damages, sole proprietor titles, incurred after**  
13 **The Article while forced to be under Digital Homicide should be**  
14 **recoverable due to its full destruction in relation to the causes of action**  
15 **being realized on September 16<sup>th</sup>, 2016 for reasons directly associated to**  
16 **The Article. See DHS complete destruction in Attachment N13.**  
17

18  
19 **FACTUAL EVENTS IN SUPPORT OF THE CAUSES OF ACTION**

- 20 25. ~~According to 28 U.S. Code § 4101:~~ On September 24<sup>th</sup>, 2015, When The  
21 Defendant falsely accused The Plaintiff and caused damage to reputation,  
22 damage to product, loss of product, and causing severe emotional distress to  
23 The Plaintiff, The Plaintiff has right to receive restitution for these damages.  
24 The statements that have been made on the Internet by The Defendant have  
25 resulted in false criticism and condemnation by the public towards The  
26  
27  
28

1 Plaintiff.

2 26. Evidence for all information contained in all line Items 1 through 20 are  
3 available even if they have been removed from the Internet at this point.  
4

5 27. The Plaintiff took direct damage through the use of his personal name, and the  
6 use of the sole proprietor Micro Strategic Designs via multiple postings of false  
7 statements in regards to claims of impersonation of ECC Games, a Polish  
8 Company based out of an apartment, on twitter.com and thejimquisition.com  
9 by The Defendant.  
10

11 28. These false statements first falsely accused DHS and The Plaintiff as a  
12 manager and then purposefully associated Micro Strategic Designs sole  
13 proprietor and The Plaintiff to DHS to ensure rebranding failure.  
14

15 29. The products and advertising lost to The Plaintiff exceeds \$2 million in market  
16 value at the time of damages. The products are listed as Operation: Global  
17 Shield, ~~Operation: Vile Strike~~, MAS, Assault on Orion 7, Attrition: Nuclear  
18 Domination, Coastal Carnage, Bombing Run, ELT, ~~Grimmezh's Journey~~,  
19 ~~Hover Tank Attack~~, Primate, Starship: Nova Strike, and two pack/bundles that  
20 could have been formed with these games, and twenty other titles later lost due  
21 to forced association to DHS.  
22

23 30. The products forced removal can be shown on Oct 13th 2015, on  
24 greenlightupdates.com which tracks greenlight submissions and removals.  
25 Primate was hidden prior to the damages caused and then was forced to be  
26  
27  
28

1 removed at the same time as the other titles. This cannot be seen on  
2 greenlightupdates.com as the item was hidden. See Attachment A.

3 31. These titles were not posted on Digital Homicide Studios LLC's Greenlight  
4 Account at the time of The Article and defamation occurring. There were  
5 seven greenlight sole proprietor accounts. Four of which were 100% owned by  
6 The Plaintiff. Vampier Straud, TheMac, SimplebutFunGames, and Micro  
7 Strategic Designs. New plans were in the making to entirely ditch Digital  
8 Homicide as a ruined brand due to the Defendant's actions prior to and within  
9 The Article. The Defendant had made false statements multiple times about  
10 DHS in The Primary video on The Defendant's Youtube Channel with over 2.5  
11 million views. For that reason, The Plaintiff had switched off to Micro  
12 Strategic Designs for separation of duties and moving away from the DHS  
13 brand.

14 32. To organize this complaint more appropriately, all counts of defamation  
15 will now be consolidated into three defamation causes of action, one for  
16 Tweets posted the day of The Articles posting, one for The Article, and  
17 one for the Ask FM statement.

18 33. Civil Conspiracy and Intentional infliction of emotional distress are now  
19 displayed in cause of action per the original complaints mention. All  
20 previous count elements are now converted to factual events and  
21 statements in support of the causes of action listed at the bottom.



34. Simplified list of false accusations is stated here:

- a. False accusation of theft of Galactic Hitman image from deviant art and covering up the statement without proper retraction twice. Libel Per Se.
- b. False accusation of theft of Slaughtering Grounds image from deviant art when the art was from a free to use wallpaper site where it had been mistaken for free use over three years ago. The Defendant attempts to associate a pattern of theft by using these two statements together. Libel Per Se.
- c. False accusation of impersonation of another company ECC GAMES SP. Z O.O. when ECC Games acronym for Every Click Counts Games was the trade name being used. These are two entirely different entity types and ECC Poland was using the trading name of Eccentricity. Libel Per Se.
- d. False accusation of defamation of another company. Libel Per Se.
- e. False accusation that The Plaintiff is in legal trouble when no legal trouble exists. Libel Per Se.
- f. False accusation of shady business practices. Libel Per Se.
- g. Accused of illegally, against Distributor terms, using keys for votes which it is specifically not stated that it is not against the terms. Libel Per Se. The Defendant has recently supported another developer, Forever SA, through Greenlight Goodstuff on Youtube, that developer

1 hands out keys for votes on Greenlight.

2 h. False accusation of illegitimately using sole proprietor trade names  
3 which are a legal business practice. Libel Per Se.

4  
5 i. Referenced to The Plaintiff as a 'wet bandit' or incompetent thief when  
6 confidential business information was leaked on a legitimate rebranding  
7 attempt so The Defendant could perform the attack. Libel Per Se.

8  
9 j. Defendant claims to 'know' all above as if reporting facts when no  
10 verification has been attempted. Libel Per Se.

11 k. Defendant claims assets are used in a fashion that portrays the games as  
12 if no work is being performed defaming business reputation. Libel Per  
13 Se.

14  
15 35. It is further important to note, that hyperbole and rhetoric are generalized  
16 statements. The Defendant's statements shown are false factual allegations that  
17 depict an action, a party or parties involved, and a location at which something  
18 is being portrayed as happening.

19  
20 36. Defamation has been so severe on Digital Homicide and The Plaintiff that a  
21 vast number of individuals now use DHS name as a branding of poor quality  
22 and no work when some titles had from 2000 to 4000 man hours involved.

23  
24 37. If The Plaintiff puts his name on a Greenlight Account it will be immediately  
25 destroyed by harassment due to the defamation of The Plaintiff by The  
26 Defendant.

i. ~~COUNT 1 LIBEL PER SE~~

38. On September 24th, 2015, The Defendant states “It’s also worth noting that Galactic Hitman’s artwork has been taken from elsewhere, just like the initial art for The Slaughtering Grounds was.” A link is provided to deviant art. The initial Slaughtering Grounds art was not taken from this site. It was a free upload to a wallpaper site and was a derivative work, which when this was discovered that the artist did not have full rights to put it up for free, it was immediately removed. The Article states that The Plaintiff used an image that The Plaintiff did not have rights to (this has happened multiple other times but this is the first time it can be related directly to heavy damages). After the initial burst of tens of thousands views on The Article, The Defendant posted a modification that “maybe” the Plaintiff did not steal it but the damage especially in context with the rest of The Article and can be seen in the comments section. No apology or special attention is given to the retraction. Receipt is included in Attachment B. Image of download is included in Attachment C. The statement is in Attachment D. These false accusations of theft have been going on for over a year. These false accusations and harassment have now destroyed not only DHS and what would have been Micro Strategic Designs but all work The Plaintiff performed for three years. See Attachment N13. Damages are now believed to be far more than original estimations. It is important to emphasize that The Defendant specifically stated

1     The Galactic Hitman image and then the Slaughtering Grounds image as an  
 2     attempt to show a history of theft, not just a single action. This false history  
 3     being portrayed by The Defendant is based off of two mistakes made by a DHS  
 4     partner early on in company effort and that damage was associated to The  
 5     Plaintiff on a sole proprietor business effort. Over fifty thousand dollars' worth  
 6     of licenses, models, image, and sound has been purchased for use.

7  
8  
9                   i. ~~COUNT 2 LIBEL PER SE~~

10     39. On September 24th, 2015, the Defendant states in The Article: **“Here, we’ve**  
 11     **seen it lead to potential legal trouble for the folks who rebranded and**  
 12     **accidentally defamed a completely different studio.”** The Defendant claims  
 13     The Plaintiff has defamed a studio which is false and tarnishes The Plaintiffs  
 14     good name. Every Click Counts, the Trade Name of The Plaintiff was plainly  
 15     visible on the developer account since its creation here:  
 16     <https://steamcommunity.com/profiles/76561198219137364>. That image was  
 17     always there even though the acronym was expanded to the full name in the  
 18     text. A single click on the account could have verified this information. See  
 19     Attachments E and F. In Attachment E, it can be seen that as soon as The  
 20     Plaintiff was contacted by ECC Games Poland The Plaintiff changed the name  
 21     to be more clear and avoid any confusion this however occurred after  
 22     defamatory comments were made and magnified by The Defendant. Defendant  
 23     has stated The Plaintiff has ‘rebranded’ away from DHS further showing  
 24  
 25  
 26  
 27  
 28

attempts to associate The Plaintiff's sole proprietor.

~~i. COUNT 3 LIBEL PER SE~~

40. On September 24th, 2015, The Defendant states in The Article “**Apparently you don’t need to prove your company’s legitimacy or even existence, since it’s all based on usernames.**” This is misleading and is defamatory and portraying false light on The Plaintiff. The Defendant himself is not incorporated in any way that can be found on The Internet. This means The Defendant himself is using Trade Names - Jim Sterling and The Jimquisition. The Defendant makes this statement in a negative way to make it seem to his young audience that normal business practice is somehow being abused. This does significant credibility damage to The Plaintiff in the eyes of the gaming public and peers as these users came and blamed The Plaintiff on active forums on The Distributor’s site. See Attachment E, F.

~~i. COUNT 4 LIBEL PER SE~~

41. On September 24th, 2015, the Defendant states in The Article: “**It (The Polish ECC Games) also has a Twitter account which, prior to now, has no history of mentioning either Devil’s Share nor Galactic Hitman**” these were the two Games branded under Every Click Counts. At no time did The Plaintiff attempt to imitate ECC Games. There were no links to Polish ECC Games websites, no links to its games, and no use of any of its developers or worker’s names. The acronym ECC Games (for Every Click Counts Games)

1 was the only text used in one location on two game pages and once in a video  
 2 where it is obvious the logo is not the same. ECC Games Poland is using an  
 3 abbreviation for Eccentricity (which was even shown at the bottom of their  
 4 webpage until recently deleted) and has no legal business formation in the  
 5 United States. No contact was attempted to the Plaintiff prior to posting of the  
 6 defamatory material that caused the damages stated. The material was posted  
 7 to purposefully cause controversy, damage, and portray The Plaintiff as having  
 8 done something illegal. The Defendant then took this false information and  
 9 magnified the damage by a factor of over a two thousand. See Attachment G,  
 10 now, and Attachment H, previous to January 2016.

11 ~~i. COUNT 5 LIBEL PER SE~~

12 42. On September 24th, 2015, the Defendant states in The Article: “That’s not  
 13 going to happen today though, and its recent chicanery may lead it into very  
 14 real legal trouble.” see Attachment I. The basis of this statement is false as  
 15 there was no attempt to impersonate another company. The company  
 16 supposedly (ECC Games) impersonated is incorporated in Poland and has no  
 17 legal right to that name in the United States as they are not registered in any  
 18 US State and have no official Trademark registered with the USPTO. It would  
 19 have taken 5 years of usage to get onto the secondary register. If ECC Games  
 20 would have been legally open for usage had The Plaintiff intended on doing so.  
 21 ~~The only record available of an attempt to register was a 2003 ECCEN (An~~

1 abbreviation for Eccentricity) posting visible via Trademarkia.com which was  
 2 abandoned, Attachment J displays this information. This section struck  
 3 through as it was discovered that was not a registration by ECC Games. A  
 4 generic Madrid Protocol registration with the same information was registered  
 5 as "Roll in the hole" on 2012-10-09. Attachment K displays this information.  
 6

7 ~~i. COUNT 6 LIBEL PER SE~~

8  
 9 43. On September 24th, 2015, The Defendant states in The Article: **"Being as sly**  
 10 **as the Wet Bandits"** comparing The Plaintiff to an incompetent thief. In  
 11 context with the stolen image and wrongdoing of corporate name  
 12 impersonation further tarnishes The Plaintiff's reputation. Please see  
 13 Attachment I.  
 14

15 ~~i. COUNT 7 LIBEL PER SE~~

16  
 17 44. On September 24th, 2015, The Defendant Tweeted a link to The Article  
 18 exposing 122000+ users to false statements: **"I wrote an article on everything**  
 19 **we know about the Digital Homicide / ECC Games weirdness."** The  
 20 Defendant states that The Defendant wrote an article then hints at "we"  
 21 showing The Defendant is speaking with others on the topic in collaboration.  
 22 See Attachment L. Attachment L was apparently missing Adding N14. The  
 23 Defendant here states that knowledge within The Article is 'known' as fact and  
 24 the statement is false as no impersonation, shady business practice, or theft  
 25 stated within The Article by The Defendant occurred. The usage of "we"  
 26  
 27  
 28

shows collusion and group effort for conspiracy to do the damage that was done. Attachment N14 shows The Defendants statement and a fan having to tell The Defendant the image was for sale on sale on Shutterstock even though The Defendant was told 3 months prior that's where DHS images were being purchased.

#### ~~1. COUNT 8 LIBEL PER SE~~

45. On September 24th, 2015, The Defendant Tweeted: **"According to the email, this ECC Games is pursuing legal action against Digital Homicide for using its name. Not enough popcorn on Earth."** This statement shows the false statements as entertainment for The Defendants viewers so that The Defendant can profit from it via view advertisements and subscriber generation. The Defendant's action spread the original defamation from the original ECC Games post from less than a 100 Twitter followers to over 120 thousand. The added comment makes it his own and it is restated in ~~the inquisition.com article~~ The Article. There is no discernible difference between the Plaintiff and Digital Homicide Studios LLC due to continual usage by The Defendant via Youtube videos and articles that use the Plaintiff's good name over the past year. The games lost were under ~~the Every Click Counts Trade Name~~ Micro Strategic Designs representing The Plaintiff directly. See Attachment M. No legal action by ECC Games Poland did or even could take place in regards to the statement. Being associated by The



Defendant within The Article as Micro Strategic Designs is the link that The Plaintiff claims losses and for all losses thereafter for being forced to do business under Digital Homicide by The Defendant, instead of being able to rebrand.

46. The Defendant profits from subscribership and ad revenue and is monetarily motivated to provide controversial topics especially about The Plaintiff who has been the target of a larger percentage of the Defendant's materials, more than most of the Triple A multi-million dollar game companies currently subject to The Defendants attacks.

47. The Plaintiff's Trade Name logo plainly displayed Every Click Counts and it can even be plainly seen in one of the Defendants videos shortly after the defamation occurred. Link for Primate provided:  
[https://www.youtube.com/watch?v=\\_weZ2cXeswA](https://www.youtube.com/watch?v=_weZ2cXeswA) The pasting of the logo is seen now over the thumbnail of the video this was changed with no explanation as to why after a majority of traffic already hit the video and the damage was done. This image was placed there weeks to months after the majority of viewers had already seen the video and shows The Defendant had knowledge that his initial research had not been sufficient and yet offers no retraction. See Attachment N.

~~i. COUNT 9 LIBEL PER SE~~

48. On the 24th of September, 2015, The Defendant Tweeted: **"Jesus Christ, I**

1 just got an email from ECC Games saying they're NOT the ECC Games  
2 Digital Homicide named itself after. This is weeeeird." The Defendant is  
3 acting shocked here to make it seem as if The Defendant has discovered  
4 something - when in fact not enough research has been performed and no  
5 attempt to contact The Plaintiff to verify identity or intent has been made. See  
6 Attachment O. The Plaintiff legally used a Trade Name and did not the imitate  
7 a foreign company that had no registered rights in the United States. The Every  
8 Click Counts image has been on the developer account since its creation March  
9 23rd, 2015. This statement was made two weeks after ECC Games Poland  
10 followed The Defendant on Twitter. ~~See Attachment O~~. Micro Strategic  
11 Designs had been its own brand name since June of 2015. See Attachment N12  
12 displaying the game Attritions launch window which has been there since  
13 August 7 2015 the date the game launched. The MSD brand name can also be  
14 seen in The Defendant's article where The Defendant links the game to Digital  
15 Homicide.

16 49. Three days after almost destroying The Plaintiff, The Defendant finally asks  
17 his subscribers to stop harassing others when my partner had asked him to do  
18 this three months prior. The Defendant essentially posts his material the  
19 viewers see it and immediately form a riot/witch hunt where they go and attack  
20 the particular products store page. See Attachment Q. This attachment  
21 contains a false accusation of DHS being Xenobyte Studios impersonators  
22  
23  
24  
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1        which was blamed on The Plaintiff over a hundred times after its posting.

2        50. For a period over a year and a half, The Defendant has directed harassing  
3        subscribers and viewers of his media outlets towards The Plaintiff's store  
4        pages. The Plaintiff has over two ~~hundred~~ thousand screenshots and 1000  
5        emails showing these harassing and damaging statements many of them  
6        include accusations of theft and illegal action although The Plaintiff has not  
7        done any such thing. Tens of thousands of posts are involved. Many of these  
8        subscribers are in fact other developers who have motives to harass and stop  
9        the Plaintiff from doing business. The Defendant acts as a funnel for these  
10       competitors providing them with extra harassment support to destroy products  
11       on The Distributor's site. The Plaintiff rebranded to Micro Strategic Designs in  
12       ~~an effort~~ to avoid harassment and was internally outed by individuals inside  
13       The Distributor even though they fully knew The Plaintiff would be using  
14       Trade Names. Dozens if not hundreds of other companies and individuals use  
15       different trade names to do business on The Distributor's site, similar to  
16       Amazon, Ebay, and thousands of other online websites.

17  
18  
19  
20  
21       51. The statements of "**might lead it into very real legal trouble**" and "**potential**  
22       **legal trouble**" by The Defendant in The Article and Tweet that caused the  
23       Skype conversation between the Plaintiff and The Distributor. The Defendant  
24       makes all the accusing statements with the intent of depicting The Plaintiff in a  
25       malicious and defamatory manner, in reckless disregard for truth, and with  
26  
27  
28

1 negligence of not performing proper research before accusation. The Article  
2 convinces the public and The Distributor that The Plaintiff is guilty of multiple  
3 false accusations.  
4

5 52. During the Skype conversation on October 13 2015 with The Distributor  
6 representatives Conor Malone and Tom Giardino, The Plaintiff was told that  
7 The Distributor was going to stop doing business with the Plaintiff. All of the  
8 Plaintiff's games were to be removed from sale. The Plaintiff managed to  
9 convince The Steam Representative, Tom, that The Plaintiff had not done  
10 anything illegal and The Plaintiff was a victim of false statements. Tom  
11 Giardino and Conor Malone had disabled the Plaintiff's developer account and  
12 were in the process of removing all of the Plaintiff's products which would  
13 destroy all of the Plaintiff's income when the Plaintiff begged The Distributor  
14 not to delete the Plaintiff's income and that the Plaintiff would give all of the  
15 Plaintiff's current sole proprietor future products on Greenlight up to avoid  
16 losing everything. Tom Giardino accepted this sacrifice. This sacrifice was  
17 made under extreme duress as The Plaintiff was about to lose over six  
18 thousand hours of coding and model work, all of The Plaintiff's income, and  
19 suffer extreme damage in the eyes of the public to the point of being unable to  
20 do business under The Plaintiff's good name. ~~See Attachment XX.~~ The  
21 Plaintiff has now been singled out as not being able to work under other  
22 companies, ie sole proprietors, and not being able to use keys to generate  
23  
24  
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1 traffic (a very common practice). The Game Suits gave away 25000 keys to  
2 generate traffic a week prior to the Skype conversation and was greenlit the  
3 day of the Skype conversation.  
4

5 53. Many of the The Defendant's subscribers are fanatical, young, and  
6 impressionable. They are easy to mislead and The Defendant specifically states  
7 on Youtube that he knows he can do so at time 15:30 to 16:00 minutes into the  
8 video The Defendant States: "But if there is one thing I have learned about  
9 game journalism, it's that you can pretty much say anything about anything,  
10 and ahh, people will swallow it, you just ascribe some sort of artistic meaning  
11 to things, whether that was the intention or not, someone will believe you."  
12

13 <https://www.youtube.com/watch?v=Wa02mXimzqk>.  
14

15 ~~i. COUNT 10 LIBEL PER SE~~

16 54. The date of this comment cannot be seen as it has now been deleted. Evidence  
17 was saved in a screenshot. On The Defendant's ask.fm/jimquisition channel,  
18 The Defendant states "Yeah it was, because Digital Homicide is more than  
19 just a bad developer. It's had a history of shady and dishonest behavior,  
20 behavior it was continuing under its new name. The very fact it was  
21 damaging the reputation of another company is entirely bad enough, to  
22 say nothing of its continued efforts to push games through Greenlight via  
23 unscrupulous means. I will not deny the pleasure I take in sticking it to  
24 them, but their name is mud for a reason, and people deserve to know  
25  
26  
27  
28

1 **who's really selling them products."** This statement assists in defining the  
2 intent of The Defendant. This statement has been deleted from  
3 ask.fm/jimquisition channel sometime between December 2015 and January  
4 2015 over 3 months after it was posted. The Plaintiff's 'name being mud' is  
5 only through The Defendant's repeated videos, articles, and statements on  
6 Twitter. These statements continually magnified minor user problems that  
7 every Steam Developer has and turned them into an all-out barrage of attacks.  
8 The 'shady behavior' is referring to Keys for votes, the day The Plaintiff was  
9 almost Destroyed by The Defendants Twitter and Article statements a game  
10 called "Suits" was admitted through greenlight having given 25000 keys away  
11 for votes just a week prior. The Defendant's 'shady behavior' statement is also  
12 The Plaintiff simply attempting to rebrand to avoid harassment caused by The  
13 Defendants media outlets. The statement that The Plaintiff is damaging the  
14 reputation of another company is false and maliciously negligent without  
15 regard for the truth. Deletion of the comment shows intent to cover the facts of  
16 the aggressive act without any regard for the damage it has done. Screenshot  
17 image is included in attachment R. **The harassers and The Defendant**  
18 **attacked The Plaintiff repeatedly forcing The Plaintiff to attempt to**  
19 **rebrand and then The Plaintiff was made to look as if doing something**  
20 **illegal when doing so just to try to work in peace.** All products can be  
21 refunded if the customer is not satisfied. Every product under 3 dollars with  
22  
23  
24  
25  
26  
27  
28

most being a dollar. A majority go on sale for less than .50 cents. Cost of ownership is extremely low. Quality is decent with play time varying from 1 to 250 hours per user.

55. Attachment Y is not the responsibility of The Defendant directly. It is a prime physical example of the + 40 thousand plus posts of hate generated due to the defamation spawning from the Defendant's actions. It is a picture of a bag of feces received by mail four weeks prior to this case filing. ~~The Plaintiff expects the problem to get worse regardless of whether or not this case is pursued as~~ The Plaintiff believes all damage is not recoverable.

### **COMPETITOR AND HARASSMENT FACTS**

56. With a single video or article, The Defendant can unleash a barrage of harassment, or a barrage of support for a particular product. While criticism is an expected part of the industry, harassment is not. See Attachment N11 showing The Defendant's knowledge of harassment instigated by The Defendant's videos and articles. The Defendant specifically states The Plaintiff is not worthy of not being harassed.

57. In Attachment N11, The Defendant specifically states a developer's family had to beg The Defendant to take his video down because of the harassment ensuing on their family members game. The Defendant then states DH did not take a reasonable approach by doing a DMCA of content owned by The Plaintiff showing that The Defendant had knowledge that the DMCA was

1 for harassment NOT for criticism as The Defendant stated in the main video  
2 on his channel with 2400000 views. The Defendant expects developers to  
3 suffer the initial harassment, while using their content, and then beg for  
4 removal of a damaging video instigating that harassment. See Attachment N5.

5  
6 **58. The Defendant then states the content will eventually be removed. See**  
7 Attachment N11. This shows direct knowledge of The Defendant that his  
8 video/product will induce harassment, and eventually destroy the product  
9 before it reaches market and the Defendant does so as a competitor in the very  
10 same market.

11  
12  
13 59. Shown also in Attachment N6, The Defendant shows 'cleanlight hq' and  
14 "Steam Cleaner" showing intent and location to organize to attack targeted  
15 products. These references are to the usage of videos to generate harassment on  
16 Greenlight which forces the removal of products before they can reach market  
17 and The Defendant does so as a competitor, continually interfering with  
18 business. Several thousand screenshot examples of this can be provided upon  
19 request including one set of 50 images showing from 10-20 posts a minute  
20 attacking a developer other than The Plaintiff that was the target of a video of  
21 The Defendant.

22  
23  
24 60. The Defendant has acknowledged, as a byproduct of his creations, that his  
25 targets – competitors - are harassed. The Plaintiff has been targeted repeatedly  
26 both under DHS and outside of that company name. Micro Strategic Designs  
27



1 was directly attacked, SimplebutFunGames, and The Mac were also attacked in  
2 video shortly after The Article resulting in having to first hide from harassment  
3 and then remove those products.

4  
5 61. On November 28<sup>th</sup>, 2016, The Defendant revealed being a direct market  
6 competitor as shown in N7, N8, and N9 while using the very media outlets  
7 boosted by destroying The Plaintiff's reputation to advertise a game in the  
8 exact same market place and a kickstarter to fund it for \$55,000. Prior  
9 competitor profiting by The Defendant was discovered upon The Defendant  
10 showing this and through a video shortly after this. The Defendant uses the  
11 same media outlets to destroy competitors attempting to enter the market as he  
12 pushes his own products onto the same market. Note that in N7 PC is shown —  
13 not Steam. In N8 is shown Steam and not PC. Steam/PC \*is\* The Distributor  
14 as far as PC games goes. There is nowhere else to significantly sell them. Even  
15 Microsoft has stated they will be selling more on The Distributor.

16  
17  
18  
19 62. Due to the Defendant being a competitor, The Plaintiff may joinder further  
20 causes of action against The Defendant which are currently under debate on  
21 whether to be filed.

22  
23 63. The Article was used by The Defendant to force Operation Global Shield,  
24 Attrition Nuclear Domination, ELT, Bombing Run: Heavy Fire, Mini Attack  
25 Sub, and Coastal Carnage back under DHS after rebranding under Micro  
26 Strategic Designs had already been performed. This was a forced action by The  
27

Article and defamation which created the duress and forced The Plaintiff to reverse being rebranded. Operation Global Shield was added as it was entirely sole proprietor on Micro Strategic Designs greenlight. Operation Global Shield had \$200 of the advertisement from Micro Strategic Designs paypal dedicated to an advertisement for the rebranding.

64. For statistical data regarding interest in The Defendant see Attachment N10.

Spike A is the initial filing of this case. Spike B is three videos by The Defendant on a game (No Man's Sky) that made in excess of \$80 million in sales and was one of the top sellers on The Distributor for 2016. Spike C is the complete destruction of Digital Homicide Studios due to harassment and defamation issues heavily contributed to by The Defendant.

65. Attachments U and V are examples of another game that a developer was attacked due to videos by The Defendant. Within hours hundreds of non-game owners posted repeatedly attacking the game and its creator. This same problem was suffered by all DHS games and all DHS and sole proprietor greenlights. The Defendant's videos were a form of rally call to attack.

### **STATEMENT OF CLAIM**

#### **FIRST CAUSE OF ACTION: TORT OF DEFAMATION**

**(Libel Per Se Based upon Defendant's false statements within The Article)**

66. Plaintiff realleges and incorporates all above paragraphs.

67. On September 24<sup>th</sup> 2015, The Defendant made false and defaming statements

1 in regards to Micro Strategic Designs and The Plaintiff. Within The Article  
2 The Defendant directly associates DHS to Micro Strategic Designs, a sole  
3 proprietor of The Plaintiff and directly representing the game Operation Global  
4 Shield, Attrition: Nuclear Domination, ELT, Bombing Run: Heavy Fire, Mini  
5 Attack Sub, and Coastal Carnage. These false statements include accusation of  
6 theft, shady business practices, inferior product value affecting business  
7 reputation, false impersonation of a company that had no legal right to the  
8 name in the United States. Micro Strategic Designs was, in fact, not Digital  
9 Homicide Studios. Micro Strategic Designs was only run by The Plaintiff as a  
10 sole proprietor. The Defendant's portrayal in The Article pulls The Plaintiff  
11 under sole proprietor into a host of false statements and accusations then  
12 forcing The Plaintiff, under duress, to stop rebranding and be forced back  
13 under the DHS brand for future harassment and public attack by The  
14 Defendant.

15  
16  
17  
18  
19 68. Minimum adjusted losses directly representable by The Plaintiff \$300,000 for  
20 6 sole proprietor titles over five years at time of loss.

21  
22 69. \$1000 of lost advertisement money in direct relation to Micro Strategic  
23 Designs, The Plaintiff's sole proprietor.

24 70. \$50,000 in lost key advertisement from Attrition Nuclear Domination a game  
25 entirely owned by Micro Strategic Designs and The Plaintiff.

26  
27 71. If being referred to as Digital Homicide when under Sole Proprietor and/or  
28

1 being forced to do business under DHS after the Article is deemed recoverable  
2 by The Court for loss for all work forced done under DHS through duress after  
3 the publishing of The Article for a total of 20 unassociated games at \$10,000  
4 per game per year for 5 years for a total of \$1,000,000 and \$500,000 for loss of  
5 access to keys for over four months during critical market time stopping all  
6 advancement in the marketplace.

7  
8  
9 72. Reputational losses estimated at being unable to use The Plaintiff's name to do  
10 business in PC gaming ever in the future again The Plaintiff claims \$4,000,000  
11 in damages.

12  
13 73. Whatever damages The Court sees fit including exemplary, punitive, and  
14 compensory.

15 **SECOND CAUSE OF ACTION: TORT OF DEFAMATION**

16 **(Libel Per Se Based upon Defendant's false statements on Twitter)**

17  
18 74. Plaintiff realleges and incorporates all above paragraphs.

19 75. On September 24<sup>th</sup> 2015, The Defendant made false and defaming statements  
20 in regards to Sole Proprietor Micro Strategic Designs and The Plaintiff. The  
21 Defendant Tweeted and directly associates DHS to Micro Strategic Designs, a  
22 sole proprietor of The Plaintiff and directly representing the game Operation  
23 Global Shield, Attrition: Nuclear Domination, ELT, Bombing Run: Heavy  
24 Fire, Mini Attack Sub, and Coastal Carnage. These false statements include  
25 accusation of theft, shady business practices, inferior product value affecting  
26  
27  
28

1 business reputation, false impersonation of a company that had no legal right to  
2 the name in the United States. Micro Strategic Designs was, in fact, not Digital  
3 Homicide Studios. Micro Strategic Designs was only run by The Plaintiff as a  
4 sole proprietor. The Defendant's portrayal in The Article pulls The Plaintiff  
5 under sole proprietor into a host of false statements and accusations then  
6 forcing The Plaintiff, under duress, to stop rebranding and be forced back  
7 under the DHS brand for future harassment and public attack by The  
8 Defendant.

10  
11 76. Minimum adjusted losses directly representable by The Plaintiff \$300,000 for  
12 6 sole proprietor titles over five years at time of loss.

13  
14 77. \$1000 of lost advertisement money in direct relation to Micro Strategic  
15 Designs, The Plaintiff's sole proprietor.

16  
17 78. \$50,000 in lost key advertisement from Attrition Nuclear Domination a game  
18 entirely owned by Micro Strategic Designs and The Plaintiff.

19 79. If being referred to as Digital Homicide when under Sole Proprietor and/or  
20 being forced to do business under DHS after the Article is deemed recoverable  
21 by The Court for loss for all work forced done under DHS through duress after  
22 the publishing of The Article for a total of 20 unassociated games at \$10,000  
23 per game per year for 5 years for a total of \$1,000,000 and \$500,000 for loss of  
24 access to keys for over four months during critical market time stopping all  
25 advancement in the marketplace.

1 80. Reputational losses estimated at being unable to use The Plaintiff's name to do  
2 business in PC gaming ever in the future again The Plaintiff claims \$4,000,000  
3 in damages.

4  
5 81. Whatever damages The Court sees fit including exemplary, punitive, and  
6 compensory.

7 **THIRD CAUSE OF ACTION: TORT OF DEFAMATION**

8 **(Libel Per Se Based upon Defendant's false statements on ASK.FM)**

9  
10 82. Plaintiff realleges and incorporates all above paragraphs.

11 83. On September 24<sup>th</sup> 2015, The Defendant made false and defaming statements  
12 in regards to Sole Proprietor Micro Strategic Designs and The Plaintiff. The  
13 Defendant made the choice of posting a comment discussing a fans ECC  
14 Games question.

15  
16 84. Within that statement The Defendant states that DHS and consequently MSD  
17 has defamed Polish ECC Games, has shady business practices, and pushing  
18 games to market through unscrupulous means that are actually common place.

19  
20 85. The Defendant directly associates Micro Strategic Designs, a sole proprietor of  
21 The Plaintiff and directly representing the game Operation Global Shield,  
22 Attrition: Nuclear Domination, ELT, Bombing Run: Heavy Fire, Mini Attack  
23 Sub, and Coastal Carnage. The Defendant's statement on Ask.fm pulls The  
24 Plaintiff under sole proprietor into a host of false statements and accusations  
25 then forcing The Plaintiff, under duress, to stop rebranding and be forced back  
26  
27  
28

under the DHS brand for future harassment and public attack by The Defendant.

86. Minimum adjusted losses directly representable by The Plaintiff \$300,000 for 6 sole proprietor titles over five years at time of loss.

87. \$1000 of lost advertisement money in direct relation to Micro Strategic Designs, The Plaintiff's sole proprietor.

88. \$50,000 in lost key advertisement from Attrition Nuclear Domination a game entirely owned by Micro Strategic Designs and The Plaintiff.

89. If being referred to as Digital Homicide when under Sole Proprietor and/or being forced to do business under DHS after the Article is deemed recoverable by The Court for loss for all work forced done under DHS through duress after the publishing of The Article for a total of 20 unassociated games at \$10,000 per game per year for 5 years for a total of \$1,000,000 and \$500,000 for loss of access to keys for over four months during critical market time stopping all advancement in the marketplace.

90. Reputational losses estimated at being unable to use The Plaintiff's name to do business in PC gaming ever in the future again The Plaintiff claims \$4,000,000 in damages.

91. Whatever damages The Court sees fit including exemplary, punitive, and compensatory.

#### **FOURTH CAUSE OF ACTION: CIVIL CONSPIRACY**



**(Through Defendant's conspiring with others)**

92. Plaintiff realleges and incorporates all above paragraphs.

93. For conspiring with ECC Games of Poland members, Members within the Steam Community, and Members of The Plaintiffs business partner Valve (The Distributor), the Plaintiff claims civil conspiracy charges on actions that have damaged The Plaintiff. Had proper due diligence, and due care been performed by The Defendant, The Defendant could have properly investigated all information posted before causing damage and instead communicated with, conspired, and relied upon unreliable sources due to negligence, malicious intent, and sheer hatred of The Plaintiff.

94. Throwing caution to the wind with ill intent in mind, The Defendant has conspired and organized with others with the afore mentioned actions to destroy and ruin The Plaintiff. All conspirators are aware of the attempted rebranding of The Plaintiff and have no mistakes as to who The Plaintiff is.

95. The Defendant conspired at least 24 hours in advance of publication of false statements and made no efforts to contact The Plaintiff or verify information.

96. The Plaintiff claims \$75,000 in damages and whatever The Court sees fit including exemplary, punitive, and compensatory damages.

**FIFTH CAUSE OF ACTION:**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

97. Plaintiff realleges and incorporates all above paragraphs.



1 98. The Plaintiff brings cause of action for intentional infliction of emotional,  
 2 mental, and financial distress upon The Defendant for the actions depicted  
 3 within this amended complaint. The Defendant has performed repeated actions  
 4 and statements in attempts to disable, ruin, and destroy The Plaintiff. Those  
 5 actions and statements have in fact now destroyed The Plaintiff.

6 99. For knowingly and intentionally performing defamatory and harassing actions  
 7 The Plaintiff claims \$3,000,000 for the losses of quality of life, mental anguish,  
 8 emotional anguish, by the actions performed by The Defendant. The  
 9 Defendant's actions spread to tens of thousands of users who mimicked his  
 10 actions and then hundreds of others made videos to make ad revenue while  
 11 repeating The Defendant's false and harassing statements.

12 100. The Plaintiff also claims whatever other damages The Court sees fit  
 13 including exemplary, punitive, and compensory damages.

### 14 **PRAYER FOR RELIEF**

15 If the court finds in favor of The Plaintiff for the causes of action against The Defendant,

16 The Plaintiff requests:

17 For Damages in regards to The Tort of Defamation for malicious, false, and misleading  
 18 statements within The Article and Tweeted by The Defendant:

19 In Regards to loss of reputation: \$4,000,000

20 In Regards to loss of product under sole proprietor: \$300,000

21 In Regards to loss of sole proprietor products forced under DHS brand: \$1,500,000

1 In Regards to loss of advertisement investment: \$51,000

2 Total Defamatory Damages: \$5,851,000

3 \$75,000 for civil conspiracy to cause damage, for being the primary instigator and causer  
4 of damage, and for conspiring with others for information and co-action to cause damage.

5 \$3,000,000 and whatever other damages The Court sees fit including exemplary,  
6 punitive, and compensory damages for the cause of action of intentional infliction of  
7 emotional distress.

8 \$400,000 in time and costs of learning, filing, and bringing these causes of action.

9 The Plaintiff prays for a minimum of \$6,000,000 in punitive damages for damages The  
10 Defendant has done, is doing, and continues to do to others in a similar fashion to The  
11 Plaintiff.

12 Total Relief Request: \$15,326,000 and whatever other compensation The Court finds just  
13 and fair.

14 ~~If the court finds in favor of The Plaintiff in the Complaint of Defamation via Libel Per~~  
15 ~~Se the Plaintiff requests the following judgement for the Libel Per Se causes of action~~  
16 ~~mentioned there in reference to both the Plaintiff's good name, the Plaintiff's business~~  
17 ~~practice, and its damage in the eyes of consumers, for damage spread through other~~  
18 ~~Youtubers, and writers following in the Defendant's lead. For emotional and financial~~  
19 ~~distress, pain and suffering, and abuse at the hands of The Defendant's subscribers~~  
20 ~~magnified by the false statements depicted in this case:~~

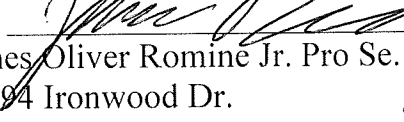
- 1 ● ~~Full reimbursement for 5 years of lost product value at the per game value at time~~  
2 ~~of loss: \$19,000 per product at 12 products for 5 years = \$1,140,000.~~
- 3 ● ~~Half reimbursement for trailing depreciating product value for the 5th to 10th~~  
4 ~~years of product life: \$9,500 per product at 9 products for 5 years = \$570,000.~~
- 5 ● ~~Loss of \$1000 in advertising and 50,000 keys used to advertise the lost products~~  
6 ~~these were current products that now these individuals will never purchase.~~  
7 ~~\$51,000.~~
- 8 ● ~~Emotional and financial distress including extreme financial strife resulting in loss~~  
9 ~~of quality of life, loss of time to visit with family, immediately upon libel striking:~~  
10 ~~\$500,000.~~
- 11 ● ~~Long term costs of time and effort to recover The Plaintiff's name and deal with~~  
12 ~~defamation locations across the net for the rest of The Plaintiff's life. \$3,000,000~~  
13 ~~\$75,000 and whatever The Court sees fit to award.~~
- 14 ● ~~Time loss dealing with this case and research involved including the almost 1500~~  
15 ~~thousand hours the Plaintiff spent performing research on law to represent~~  
16 ~~appropriately in court (this reduced game production output by a minimum of five~~  
17 ~~titles putting the Plaintiff in a worse financial position). \$800,000.~~
- 18 ● ~~Currently it has been demanded by The Distributor due to the damage caused that~~  
19 ~~is presented in this case that The Plaintiff cannot rebrand in an attempt to get out~~  
20 ~~from under this defamation. Unless this can be reversed all future titles will~~  
21 ~~suffer at an impossible to calculate amount in the definite millions to tens of~~

millions in future losses as the Plaintiff's skillset has and continues to increase significantly. Minimum reasonable value is \$5 million as The Distributor is the prime outlet for PC games with in excess of 80% of PC digital distribution market. If after this case is over, Steam will allow The Plaintiff to rebrand then this damage can be considered half as there will always be the possibility that The Distributor who has a virtual monopoly over the PC game market may have a fan of The Defendant in its midst that can do damage to The Plaintiff. Plaintiff has now been completely destroyed by defamation effects heavily contributed to by The Defendant.

- ~~Punitive damages in the amount of \$10 million to discourage The Defendant, and all others that followed suit with The Defendants actions, from performing similar actions in the future. A minimum of 20 other former victims such as The Plaintiff have been singled out and destroyed for profit in a manner which replaces their copyright created material with a video from The Defendant while using the target's content.~~
- ~~OR The removal of all media outlets and court order for The Defendant never to participate in Game journalism, Let's plays, or any other media outlet game based Internet material again any time in the future and \$1,000,000 from The Defendant or available insurance policy.~~

Dated this 12 day of February 2016  
 James Oliver Romine Jr.  
 12494 Ironwood Dr.  
 Yuma, Arizona 85367

1 RESPECTFULLY SUBMITTED this Day 2 of February 2017

2  
3 By:   
4 James Oliver Romine Jr. Pro Se.  
5 12494 Ironwood Dr.  
6 Yuma, Arizona 85367  
7 jromine2445@gmail.com  
8 928-276-1844

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on February 2nd, 2017, I caused the  
11 foregoing document to be filed with the Clerk of Court  
12 by mail which will notify the below recipient through  
13 CM/ECF System transmittal of Notice to the following  
14 CM/ECF registrant:

15 HARTMAN TITUS PLC  
16 Bradley P. Hartman  
17 John D. Titus  
18 7114 E. Stetson Drive, Suite 205  
19 Scottsdale, Arizona 85251-3250  
20 *Attorneys for Defendant*

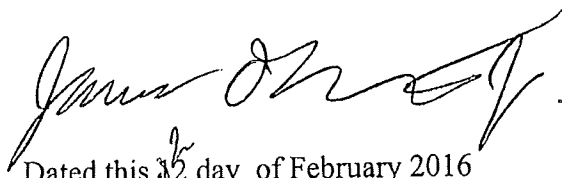
21 /s/James Oliver Romine Jr. Pro Se.

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

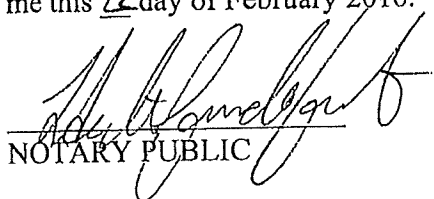
<p>JAMES OLIVER ROMINE JR.  Plaintiff  v.  JAMES NICHOLAS STANTON  Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
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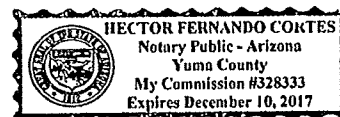
I James Oliver Romine Jr, depose and state that Attachment A is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 12 day of February 2016.

  
NOTARY PUBLIC





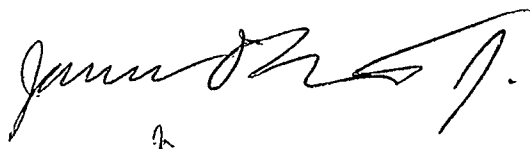
Attachment A

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

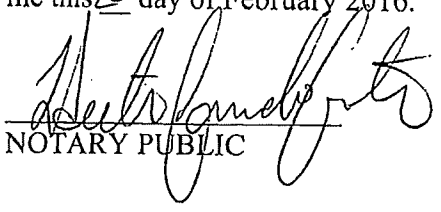
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

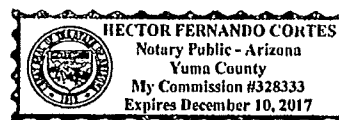
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment 13 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

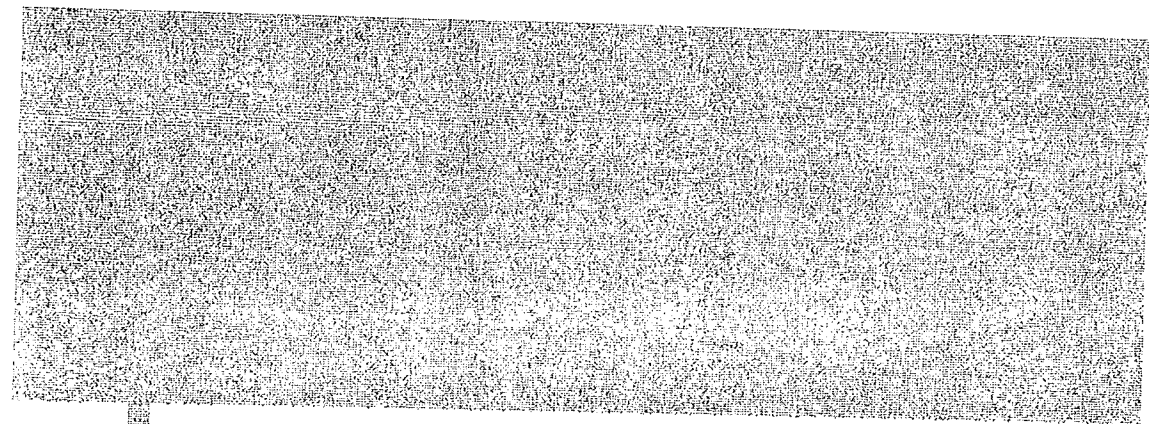
  
Dated this 22<sup>nd</sup> day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
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Credit Card ending in: 8505

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Yuma, AZ 85367

United States

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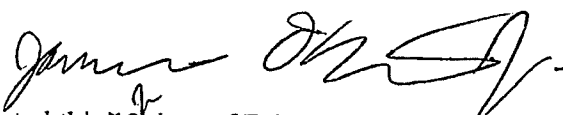
Attachment B

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

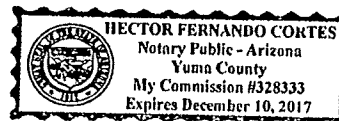
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
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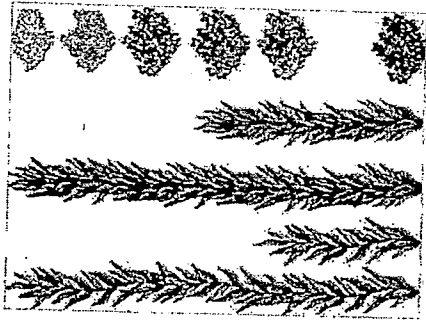
I James Oliver Romine Jr, depose and state that Attachment C is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 22<sup>nd</sup> day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
NOTARY PUBLIC

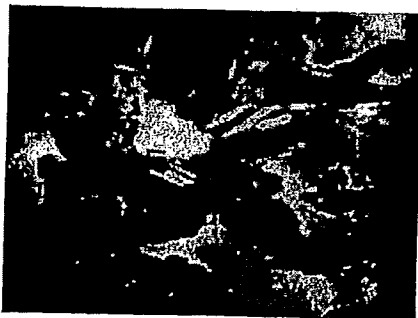




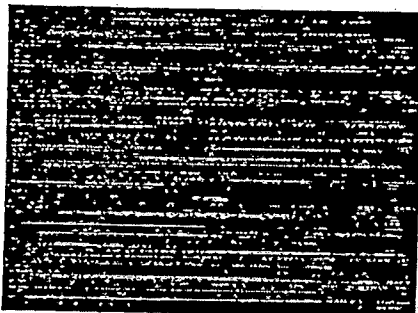
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9/2/15  
Standard License



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9/3/15  
Standard License



242774797  
9/4/15  
Standard License



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9/4/15  
Standard License

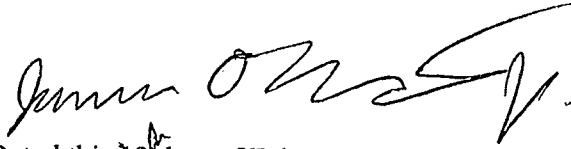
Attachment C

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

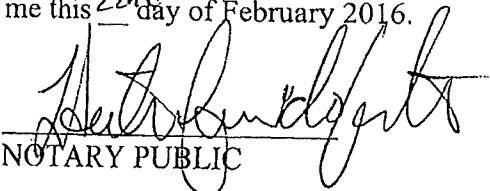
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

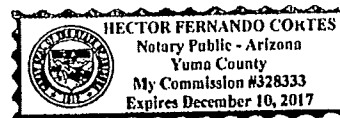
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment D is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 22<sup>nd</sup> day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
NOTARY PUBLIC



You can watch video footage of *Devil's Share* and *Galactic Hitman* by clicking those prior links – they carry all the classic hallmarks of a Digital Homicide production. The assets are all store-bought, they're both hideous to look at, interactively generic, unfinished, and broken in some significant way. The only difference is the rebranding of the developer – surely a response to the fact that James and Robert Romino know their prior company's name is mud on Steam these days.

It's also worth noting that *Galactic Hitman's* artwork has been taken from elsewhere, just like the initial art for *The Slaughtering Grounds* was. You can see the original imagery here, which Faker-ECC may have purchased from Shutterstock. Does DH even *have* a single artist?

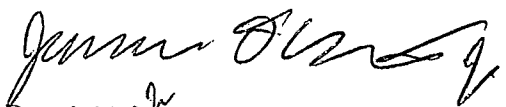
[**Note:** Initially I suggested Digital Homicide just took the image from a Deviantart artist without permission, not knowing it was also sold on Shutterstock. The text has been edited to reflect this.]

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

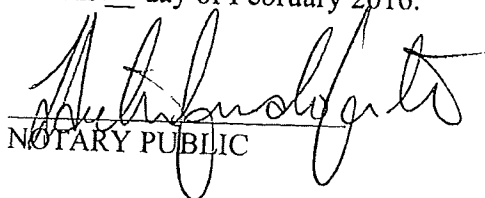
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

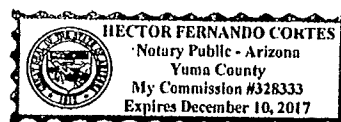
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment E is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22nd day of February 2016.

  
NOTARY PUBLIC







James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

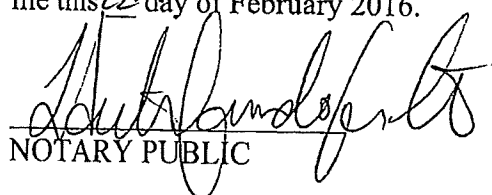
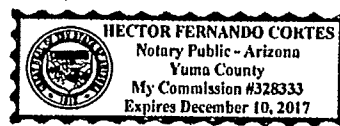
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment F is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
NOTARY PUBLIC


When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

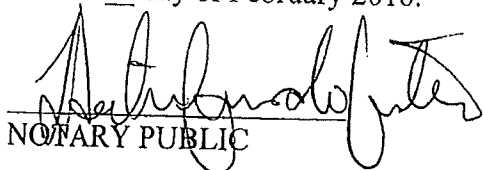
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

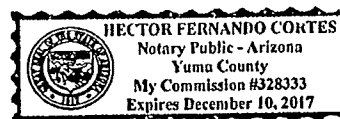
JAMES OLIVER ROMINE JR.  Plaintiff  v.  JAMES NICHOLAS STANTON  Defendant	Case No.:   <b>AFFIDAVIT OF VERIFICATION</b>   TRIAL BY JURY: No
---	--

I James Oliver Romine Jr, depose and state that Attachment 6 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
NOTARY PUBLIC



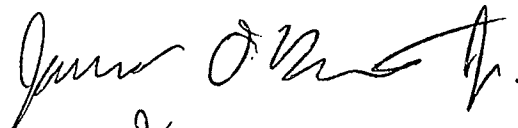


James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

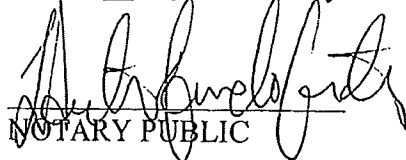
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

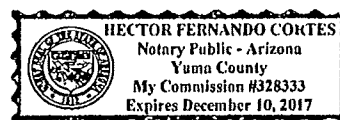
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment 14 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22nd day of February 2016.

  
NOTARY PUBLIC



**CUSTOMER SUPPORT**

If you experience a problem with downloading, installing, buying or using our products or services please contact:  
[support@eccgames.com](mailto:support@eccgames.com)

**PRESS**

For press related enquiries please contact:  
[press@eccgames.com](mailto:press@eccgames.com)

**BUSINESS**

For business related enquiries please contact:  
[b2b@eccgames.com](mailto:b2b@eccgames.com)

**ADDRESS**

ECC GAMES Sp. z O.O.  
 NIP / VAT: PL5252599944  
 REGON: 147481416  
 KRS: 0000540727  
 Wysokość kapitału  
 zakładowego 800000,00 Zł

**Office:**

ul. Mierosławskiego 23  
 01-567 Warsaw  
 POLAND

Eccentricity




Attachment H

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

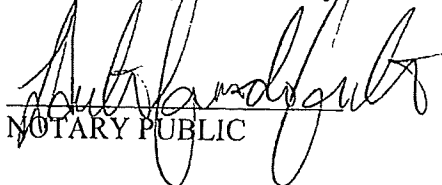
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

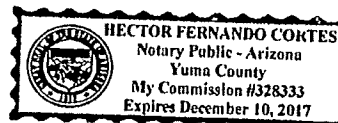
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment I is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 22<sup>nd</sup> day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
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When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

Someone on Twitter asked me how they "got away" with calling themselves ECC Games. The fact is, they didn't have to "get away" with anything, at least not as far as Steam is concerned. Once again, Valve's lack of oversight makes it easy to just call yourself ECC Games, regardless of who is *actually* allowed to trade under that name.

Digital Homicide's official channels have maintained radio silence for months, seeming to operate solely through these sockpuppet companies. Being as sly as the Wet Bandits, however, it hasn't taken long for the Internet to dig up their latest sleazy shenanigans.

At some point, this "studio" is going to have to realize it is neither talented enough to become a producer of good games, nor clever enough to trick us into believing it is.

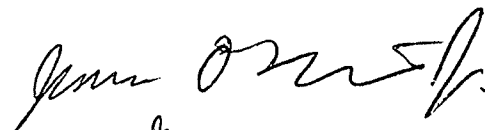
That's not going to happen today though, and its recent chicanery may lead it into very real legal trouble.

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jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

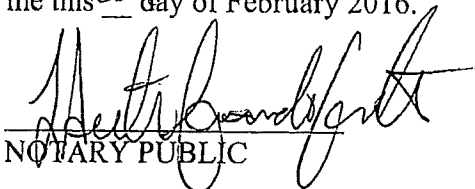
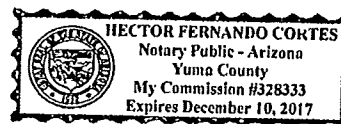
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment K is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22nd day of February 2016.

  
NOTARY PUBLIC

WIPO Global Brand Database X [www.wipo.int/branddb/en/](http://www.wipo.int/branddb/en/) OHIM Trademark

610470639 - Roll in the hole  
Status: Registered (2012-10-09)

(551) Date of first registration: 28-12-19-95

(710) Serial number of the application: 610470639

(720) Date of filing of the application: 28-11-12-95

(720) Language(s) of the application: si

(180) Expected expiration date of the registration: 28-12-12-25

(541) Reproduction of the mark where the mark is represented in standard characters:  
Roll in the hole

(550) Indication relating to the nature or kind of mark:  
Inch/cent

Word

(731) Name and address of the applicant:  
Pilot Magazine  
Israelite - Trademark (05-353) PL

(740) Name and address of the representative:  
JACZYNSKA INSPECIENCY KANCELARIA PRAWO-PATENTOWA  
Warszawa (02-105) PL

(521) Indication to the effect that the mark has acquired distinctiveness through use in trade:  
false

(531) The International Classification of Goods and Services for the Purposes of the Registration of Marks (Nice Classification) and the list of goods and services classified according thereto:

9 Scientist, nautical, surveying, photogrammetric, cinematographic, optical, weighing, measuring, signalling, checking (supervision), time-keeping and teaching apparatus and instruments; Apparatus and instruments for conducting, switching, transforming, accumulating, regulating or controlling electricity; Apparatus for recording, transmission or reproduction of sound or images; Magnets; coils; carriers; recording discs; Submarines; vending machines and mechanisms for coin-operated apparatus; Cash registers; calculating machines; data processing equipment and computers; File-encrypting apparatus; File-encrypting computer software; Computer programs (downloadable software); Resolved computer programs; magnet data media

28 Games and playthings; Gymnastic and sporting articles not included in other classes; Decorations for Christmas trees; Games and playthings; gymnastic and sporting articles not included in other classes; toy balloons; swimming pools (play articles); explosive balloons (Christmas crackers); skateboards; playing cards; counters for games; dolls; kites; puppets; toy masks; teddy bears; plush toys; puzzles; trophies (toys); board games

41 Education; Providing of training; Entertainment; Sporting and cultural activities; Games services provided online (via computer networks); arranging competitions (education or entertainment)

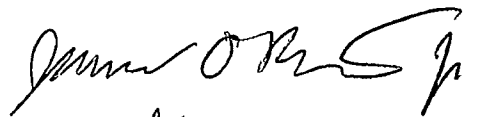
OHIM Trademark

James Oliver Romine Jr. Pro Se Litigant  
 12494 Ironwood Dr.  
 Yuma, Arizona 85367  
 928-276-1844  
 jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF ARIZONA**

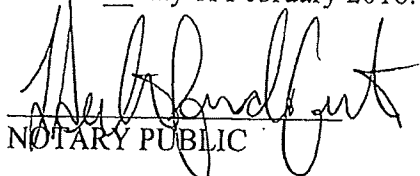
<p style="text-align: center;">JAMES OLIVER ROMINE JR.  Plaintiff</p> <p style="text-align: center;">v.</p> <p style="text-align: center;">JAMES NICHOLAS STANTON  Defendant</p>	<p>Case No.:</p>  <p style="text-align: center;"><b>AFFIDAVIT OF VERIFICATION</b></p>  <p>TRIAL BY JURY: No</p>
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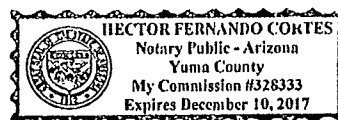
I James Oliver Romine Jr, depose and state that Attachment M is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016  
 James Oliver Romine Jr.  
 12494 Ironwood Dr.  
 Yuma, Arizona 85367

Sworn to and subscribed before  
 me this 20th day of February 2016.

  
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status/647005008819437568

**Jim Sterling** @JimSterling Follow

According to the email, this ECC Games is pursuing legal action against Digital Homicide for using its name. Not enough popcorn on Earth.

RETWEETS 59 LIKES 392

4:09 AM - 24 Sep 2015

**Mhykul** @Spamett · 24 Sep 2015  
@JimSterling The plot thickens..

**Nick Piers** @NickPiers · 24 Sep 2015  
@JimSterling I've said it once, I'll say it again: Digital Homicide is the gift that keeps on giving. Because they're idiots.

**Jonathan McCabe** @MoistLounge · 24 Sep 2015  
@JimSterling HIT THE LEVER

**Robert Koganov** @TH3R3P3R · 24 Sep 2015  
@JimSterling Oh this is going to be a good episode when you make it lol

**John Sinderman** @JSinderman · 24 Sep 2015  
@JimSterling I can't even. Can we be sure Digital Homicide isn't some sort of brilliant performance art troupe?

Show more

Attachment M

James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
Yuma, Arizona 85367  
928-276-1844  
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

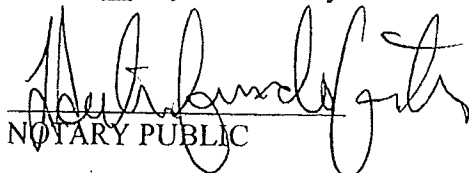
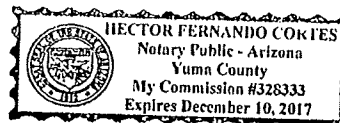
JAMES OLIVER ROMINE JR.  Plaintiff  v.  JAMES NICHOLAS STANTON  Defendant	Case No.:   <b>AFFIDAVIT OF VERIFICATION</b>   TRIAL BY JURY: No
---	--

I James Oliver Romine Jr, depose and state that Attachment N is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

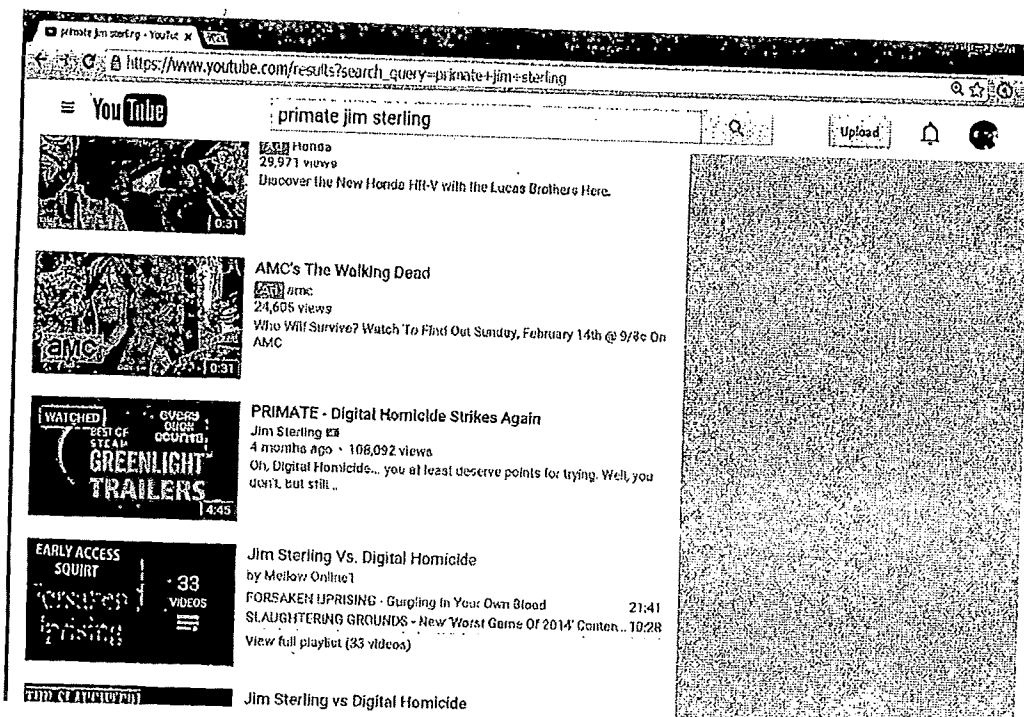


Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22nd day of February 2016.

  
NOTARY PUBLIC





Attachment N




James Oliver Romine Jr. Pro Se Litigant  
12494 Ironwood Dr.  
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928-276-1844  
jromine2445@gmail.com

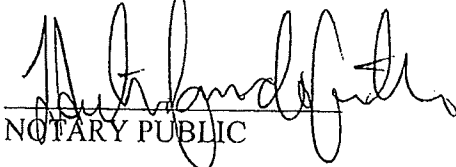
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

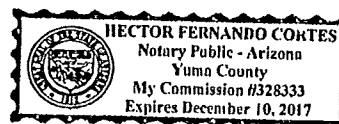
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
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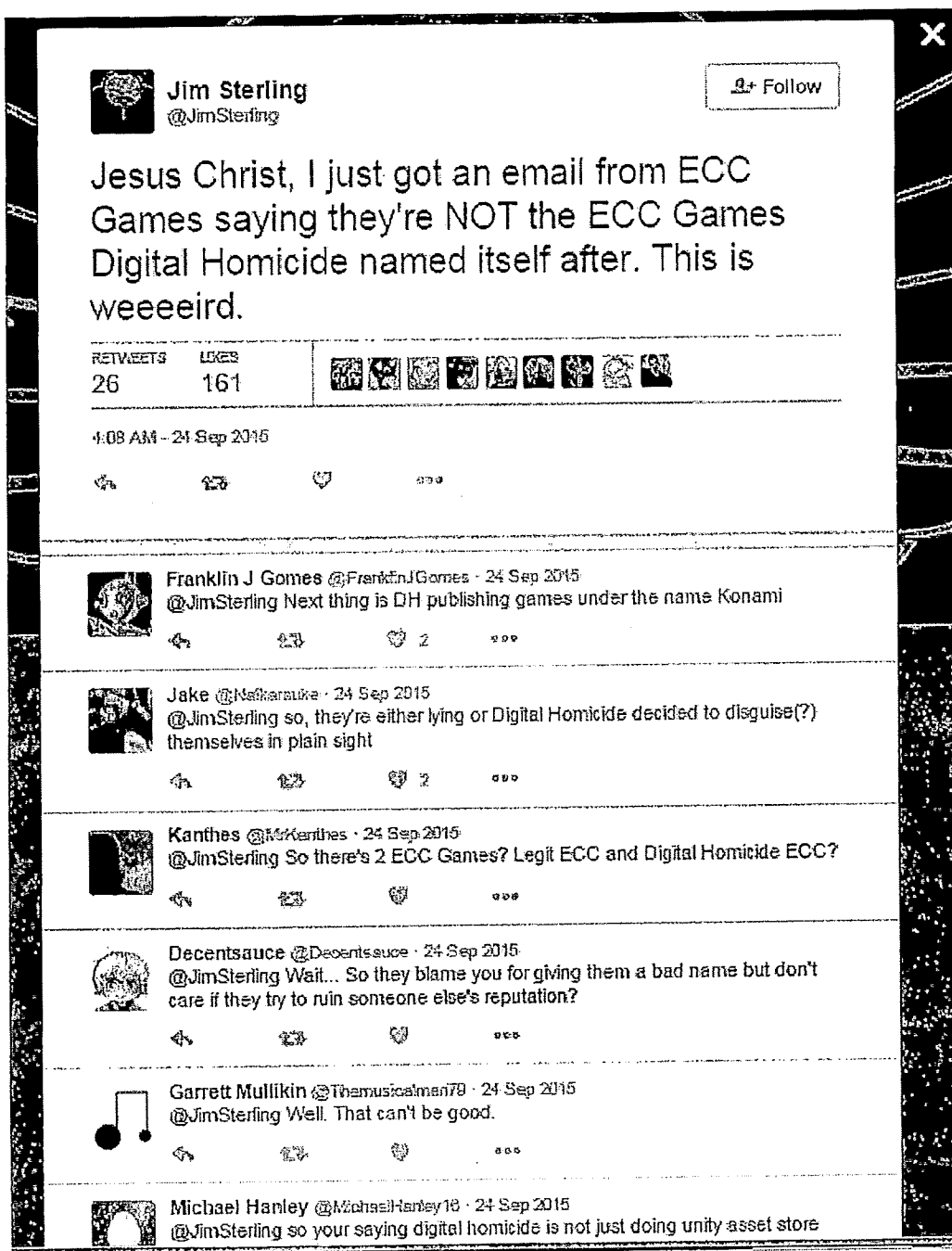
I James Oliver Romine Jr, depose and state that Attachment   C   is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
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928-276-1844  
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

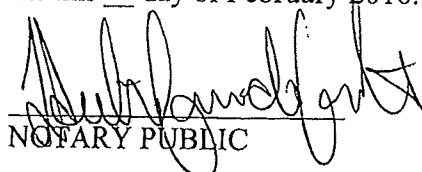
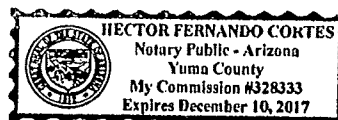
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment Q is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22nd day of February 2016.

  
NOTARY PUBLIC

Twitter - When you're on...  
www.twitter.com/showin\_1snla4

**TwitLonger** Ad-Free Account

**The Unclean Killer @umsterling**  
147 followers  
147 tweets  
147 retweets  
147 likes

**75 VENTURE OUT FOR A GREAT DEAL**  
Wait in line to get the new...  
147 followers  
147 tweets  
147 retweets  
147 likes

Important: xenobystudios.com has NOTHING to do with the killer developer (strongly rumored to be Digital  
Homicide) who recently attempted a character assassination via a Tumblr blog called "Jim Flips The Bird."  
(http://jflipsthebird.tumblr.com)

It's come to my attention that some people have been sending messages to the owners of xenobystudios.com  
and xenobystudios.co.uk - two sites owned by a small group of university students who are NOT related to the  
"Ivan Raddis" character who has been trying to cause trouble under the handle of @xenobystudios

The real Xenobystudios (the students) have been receiving harassment, something I've already had to  
directly ask some of you to STOP DOING.

Again, I ask:

**PLEASE STOP HARASSING PEOPLE ON MY BEHALF.**

This is an EXCELLENT example of why it's a bad idea. Due to what is clearly an individual with a grudge  
misusing an existing studio name to attack me, some innocent people have been caught in the crossfire and I'm  
currently apologizing to them because of what a select few of you have done.

I love the support you people give me, and I love seeing the word spread when I'm a target of bullshit, as it  
happens a lot and I know I'll have my back is amazing. But leave it at support and spreading of awareness.  
Please please PLEASE do not get personal with developers, try to find their personal info, send them threatening  
or hateful emails, or anything like that. It makes all of you, it makes me, look like bad people. We're better than  
jokes like the so-called Ivan Raddis.

Thank you.

Reply · Report Post

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DMV

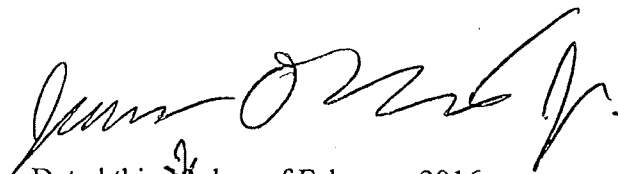


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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

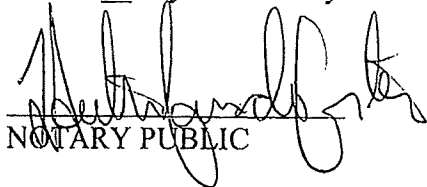
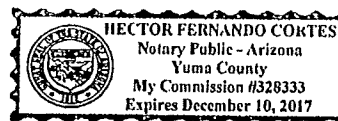
<p>JAMES OLIVER ROMINE JR.</p> <p>Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON</p> <p>Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment R is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 12 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22nd day of February 2016.

  
NOTARY PUBLIC

Do you think UN regulation of the internet is really a bad thing? Given how poorly many countries handle their legal systems over the internet (particularly America), wouldn't it be a benefit if they just revised the agreement?

The UN thing is so amazingly overblown. It will not "censor" the Internet and the things I've read about Anita Sarkeesian having the power to get people arrested is unbelievably delusional. I think it's a good thing that the UN is looking into tackling online abuse and harassment, and I'd say the same thing of Google's recent efforts too. The only people who have anything to be afraid of there are, well, abusers and harassers.

Anybody likening it to SOPA and PIPA are being ludicrous, and showcasing their complete lack of aptitude for the politics they repeatedly dabble in while claiming they hate politics being involved in everything.

2 days ago

6 people like this

Jim, why do you feel it was necessary to out ECC games as Digital Homicide? It's clear that with the new identity, these guys wanted to start anew and leave the past behind. They can still be criticized, sure, but I think it's spineful to bring their past reputation into it if it's not relevant.

Yeah it was, because Digital Homicide is more than just a bad developer. It's had a history of shady and dishonest behavior, behavior it was continuing under its new name. The very fact it was damaging the reputation of another company entirely is bad enough, to say nothing of its continued efforts to push games through Greenlight via unscrupulous means.

I will not deny the pleasure I take in sticking it to them, but their name is mud for a reason, and people deserve to know who's really selling them products.

2 days ago

5 people like this

Were you going to share the reason why Moo tech's take down failed? I read that on twitter earlier and haven't found any follow-up.

I will, yes, but currently it's not something I can share. I'm chomping at the bit to talk about it, and will do as soon as I can. It's potentially Jimquisition material, to boot.

2 days ago

1 person likes this

Considering the decision by Ubisoft to include a trans person in the new AC, I'm guessing the new Jimquisition is going to be talking about representation of social and ethnic groups in video games, am I close? (I assume ethnic groups because of the picture of Voss)

It is more distinctly tied to Voss and similar things.

2 days ago

2 people like this

Isn't it funny how some people can't comprehend that a male might be interested in female rights so they have to come up with a "his wife" makes him say that!!!!!! story just to prevent their narrow minds from exploding? Good thing none of that is real.

Step 1: Find a woman to blame.

Step 2: Dribble.

2 days ago

4 people like this

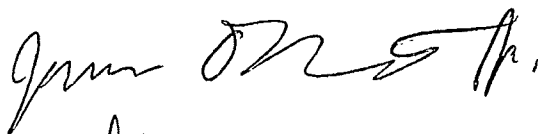
not a question but in response to the question about nitpick theater and audience enjoying it.

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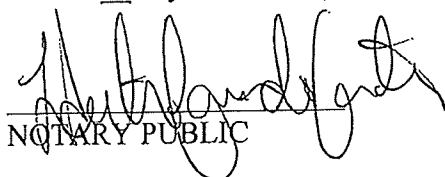
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FOR THE DISTRICT OF ARIZONA**

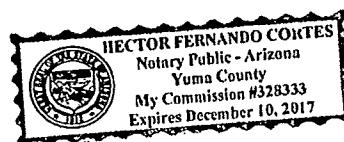
<p>JAMES OLIVER ROMINE JR.</p> <p>Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON</p> <p>Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
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I James Oliver Romine Jr, depose and state that Attachment u is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 12 day of February 2016  
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Yuma, Arizona 85367

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me this 22nd day of February 2016.

  
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Steam STORE COMMUNITY DIGITAL HOMEODE ABOUT SUPPORT

Steam Community General Discussion x

steamcommunity.com/app/293330/discussions/

Store Page

Discussions | Steamcharts | About | Broadcasts | Videos | News | Guides | Reviews

## Cat Simulator

123456 >

Jim writing Stealing soul 3 hours ago 10

Wesley 3 hours ago

Am't Madin' Finer Than A Bantengon Whiner 3 hours ago 3

Especially 3 hours ago

Reviews are played to put up positive reviews? 3 hours ago

Blaze 3:44 3 hours ago

Would be better... 3 hours ago

1522222 3 hours ago

Asset flipping garbage 3 hours ago

Chastity 3 hours ago

Someone actually made a better game in like 4 hours 3 hours ago

My Personal Editor 3 hours ago

Winn needed son 3 hours ago

Lydia 3 hours ago

How to get this game COMPLETELY FOR FREE (if you wish so) 3 hours ago 16

Is this a complete cat simulator without 99% sleeping, just saying... 3 hours ago 1

Quincy 3 hours ago

Assists a Flippin' 3 hours ago

Vladimir 3 hours ago

Jim Stealing Video Discussion 3 hours ago 1

After 3 hours ago

BORICU 3 hours ago

Revenge 3 hours ago

Jumpusdon: Cat Simulator 3 hours ago

Wesley 3 hours ago

Recycling publicly available assets doesn't constitute as a g... 3 hours ago

Dr. Doom 3 hours ago

False Positive reviews 3 hours ago

Araby 3 hours ago

Stealing 1:55 at 81 entries 3 hours ago

Per page 15 entries

123456 >

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General Discussions 83

Trading 1

Discussions Rules and Guidelines

YOUR PROFILE

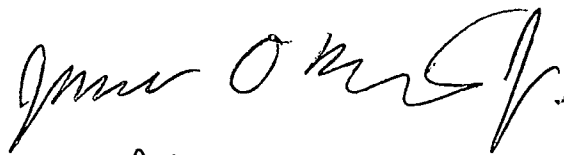
Post History

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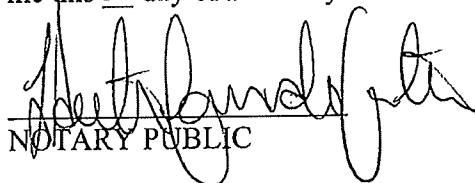
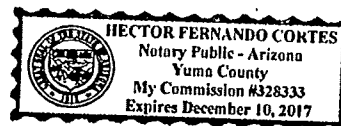
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.:</p> <p><b>AFFIDAVIT OF VERIFICATION</b></p> <p>TRIAL BY JURY: No</p>
--	---

I James Oliver Romine Jr, depose and state that Attachment V is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.



Dated this 22 day of February 2016  
James Oliver Romine Jr.  
12494 Ironwood Dr.  
Yuma, Arizona 85367

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February 2016.

  
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steamcommunity.com/app/393390/discussions/?p2

STEAM STORE COMMUNITY ABOUT SUPPORT

Cat Simulator

Showing 15-30 of 63 entries

False Positive reviews

HardPlay

Feb 15 @ 8:34am

Jim Starting 2nd Video

Disappointed. Sorry

Assets used in this game are used ILLEGALLY!

Feb 15 @ 7:25am

Feb 15 @ 8:28am

This exists because?

Feb 15 @ 5:57am

inquisition slandering

Feb 14 @ 7:25pm

was reason

Feb 14 @ 5:15pm

hey now...

Feb 14 @ 5:15pm

gameplay 955

THERE IS NO CATS IN THIS GAME!

Feb 14 @ 1:44pm

"Project CATS" second by

Feb 14 @ 11:02am

75% positive reviews?

Feb 14 @ 8:46am

who voted for this?

Feb 14 @ 4:34am

The Windows Specter

How much money was spent paying for positive reviews?

Feb 14 @ 2:02am

Feb 14 @ 1:16am

What they're saying is...

Feb 13 @ 11:29pm

he didnt even give me a ban reason

Feb 13 @ 8:10pm

can't find project calls on the store

Feb 12 @ 7:46pm

Opinions please.

Feb 12 @ 7:46pm

Guys

Showing 15-30 of 63 entries

Per page: 15 30 50

Start a New Discussion

General Discussions

Trading

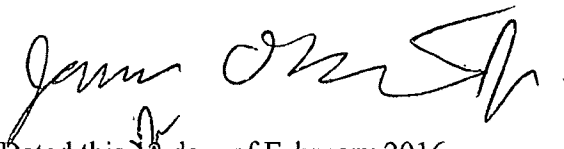
Discussions Rules and Guidelines

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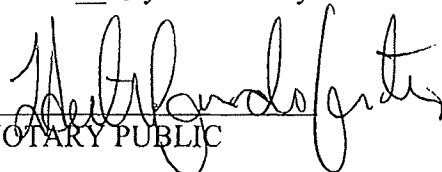
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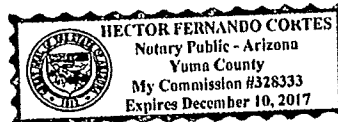
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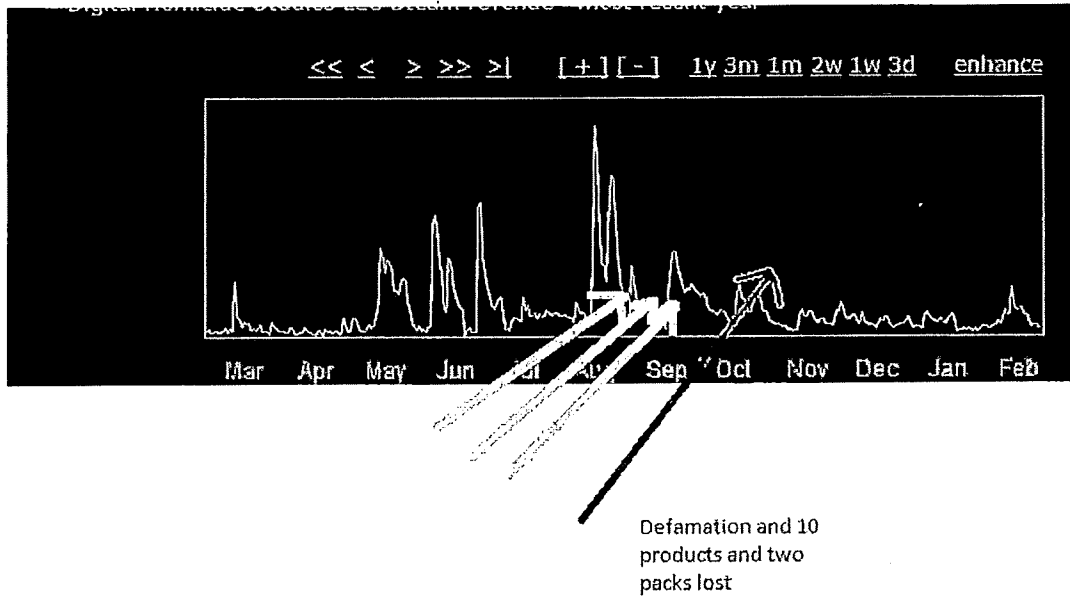
I James Oliver Romine Jr, depose and state that Attachment 2 is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

  
Dated this 22 day of February 2016  
James Oliver Romine Jr.  
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me this 22 day of February 2016.

  
NOTARY PUBLIC





The 3 White arrows express the addition of products to submission stage by Every Click Counts and The Plaintiff's other Trade Names. This is initial standard product staging before being incorporated.

The Grey Arrow indicates the loss of these products and advertising efforts.